

**Exhibit 30**  
**L. Franklin August 8, 2023 Deposition**  
**Transcript Excerpts**

**In the Matter Of:**

*DOE vs*

*MINDGEEK USA*

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*LAUREN FRANKLIN*

*August 08, 2023*

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1  
2 UNITED STATES DISTRICT COURT  
3 CENTRAL DISTRICT OF CALIFORNIA  
4 SOUTHERN DIVISION

5 -----X  
6 JANE DOE on behalf of herself and all others  
7 similarly situated,

8  
9 Plaintiff,

10  
11 v.

12 MINDGEEK USA INCORPORATED, MINDGEEK S.A.R.L.,  
13 MG FREESITES, LTD (D/B/A PORNHUB), MG  
14 FREESITES II, LTD, MG CONTENT RT LIMITED, AND  
15 9219-1568 QUEBEC, INC., (D/B/A MINDGEEK),

16  
17 Defendants.  
18 -----X

19  
20 VIDEOTAPED DEPOSITION OF  
21  
22 LAUREN HERBERT FRANKLIN  
23  
24  
25

DATE: August 8, 2023

TIME: 9:04 a.m.

PLACE: 1095 Avenue of the Americas, New  
York, New York

BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ

JOB NO: 2023-907124

1 L. FRANKLIN

2 notification of potential CSAM, we may have  
3 treated that differently.

4 Q. What do you mean a review that  
5 MindGeek did internally?

6 A. Meaning reviewing the content at  
7 the outset rather than receiving a  
8 notification from an individual.

9 Q. Well, we're talking about in the  
10 circumstances of when Vobile MediaWise  
11 detects potential CSAM, what would happen in  
12 that circumstances to the CSAM content?

13 A. As far as preservation, I don't  
14 know exactly what would happen in that  
15 instance.

16 Q. Would the CSAM content be reported  
17 to some law enforcement agency?

18 MS. MASSEY: Object to form.

19 A. In November 2019, we were not  
20 reporting to a law enforcement agency. We  
21 began reporting to NCMEC in April of 2020.

22 Q. In November 2019, you were not  
23 reporting to law enforcement agencies or  
24 NCMEC, correct?

25 MS. MASSEY: Object to form.

1 L. FRANKLIN

2 A. They were not reporting that  
3 content at that time. That doesn't mean that  
4 we didn't report content from November 2019  
5 to NCMEC after the fact.

6 Q. What do you mean by content was  
7 reported to NCMEC after the fact?

8 A. Meaning that even though we didn't  
9 have the mechanism to report to NCMEC in  
10 November of 2019, we can still report that  
11 content to NCMEC later on after we formed  
12 that -- the relationship to report to NCMEC.

13 Q. In November 2019, did MindGeek  
14 have a relationship with law enforcement?

15 MS. MASSEY: Object to form.

16 A. MindGeek cooperated with law  
17 enforcement upon receiving legal requests or  
18 communication from law enforcement.

19 Q. But if MindGeek's technology like  
20 Vobile MediaWise detected potential CSAM,  
21 MindGeek would not report that content to law  
22 enforcement in November 2019, correct?

23 MS. MASSEY: Object to form.

24 A. Again, at the -- in November 2019,  
25 we were not reporting to NCMEC at that time,

1 L. FRANKLIN

2 co-performers in videos?

3 A. Can you clarify your question?

4 Q. Yoti is used to verify the  
5 identity of a person who is an uploader to  
6 MindGeek's website, correct?

7 A. Yes.

8 Q. If an uploader to MindGeek's  
9 website is depicted in a video with another  
10 performer, does that second performer have to  
11 go through the Yoti verification process?

12 MS. MASSEY: Object to form.

13 A. Currently we don't require that  
14 co-performer submits their identification.  
15 We may in certain circumstances and we  
16 encourage all of our performers to do so.

17 Q. In what circumstances would you  
18 require the co-performer to submit to  
19 identification?

20 A. An example of that would be if we  
21 receive a complaint. If we receive a concern  
22 about that content or if, internally, we flag  
23 that as needing additional identity  
24 verification documents.

25 Q. What do you mean a complaint about